



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

VIA UPS

FEB 29 2016

Mr. Justin Klavan
Environmental, Health & Safety Manager
AAI Corporation
124 Industry Lane
Cockeysville, MD 21030

Re: Request for Information Pursuant to Section 3007(a) of the Resource Conservation and Recovery Act, 42 U.S.C. § 6927(a), Regarding Generation and Management of Hazardous Waste by AAI Corporation

Information Request - Reference No. C16-012
EPA ID No. MDD003090198

Dear Mr. Klavan:

The U.S. Environmental Protection Agency, Region III ("EPA") is requesting information to supplement the information obtained during its inspection of AAI Corporation ("AAI" or "the Facility") located in Cockeysville, MD on April 7-8, 2015. EPA is requesting this information pursuant to the authority granted to it under Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6927(a), which provides in relevant part that "any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes shall, upon request of any officer, employee or representative of the Environmental Protection Agency, duly designated by the Administrator, . . . furnish information relating to such wastes" EPA hereby requires that you furnish to EPA, within **thirty (30) calendar days** of receipt of this letter, the information requested below, including all documents responsive to such request.

For each and every request, if you have any reason to believe that there may be a person(s) who may be able to provide a more detailed or complete response to such request or may be able to provide additional responsive documents, then as a part of your response to such request, identify each such person and the additional information or documents which such person may be able to provide. Furthermore, for each and every response, if information or documents responsive to such request are not in your possession, custody or control, then as part of your response to such request, identify each person from whom such information or documents may be obtained.

Please provide a separate narrative response to each information request. Precede each answer with the number of the question or letter of the subpart of the request to which it corresponds. A request for documents shall be construed as a request for any and all documents maintained by you or in your custody, control, or possession or in the possession, custody or control of any of your employees or agents, relating to the matters described below. All copies of documents submitted to EPA in response to the following requests must be complete and legible.

As used herein, the term "document" means: writings (handwritten, typed or otherwise produced or reproduced) and includes, but is not limited to, any invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, books of original entry, minutes of meetings, memoranda, notes, calendar or daily entries, agendas, bulletins, notices, announcements, charts, maps, photographs, drawings, manuals, brochures, reports of scientific study or investigation, schedules, price lists, telegrams, teletypes, phonograph records, magnetic voice or video records, tapes, summaries, magnetic tapes, punch cards, recordings, discs, computer print outs, or other data compilations from which information can be obtained or translated.

All other terms used in this request for information that are defined in RCRA, 42 U.S.C. §§ 6901 *et seq.*, or 40 C.F.R. Parts 260-266 and 268 shall have the meanings set forth therein.

Requested Information

1. During the April, 2015 EPA CEI, the EPA inspector observed five boxes filled with waste chemicals and materials in the Main Storage Area. Please refer to Photos #5 – Photo #9 of the attached EPA CEI Report. At the time of the inspection, Facility personnel stated that all the containers within each box were waste from a laboratory cleanout. With regard to the containers accumulated in the Main Storage Area, please answer the following:
 - a. Provide a detailed description of the process or processes that generated the content of each container, and provide a detailed description of the content of each container.
 - b. Provide the date on which the content of each container was generated and state the basis of your knowledge. If an exact date cannot be determined, estimate the generation month and year.
 - c. State the exact date when the containers were moved to the Main Storage Area.
 - d. State the amount (weight and volume) of material in each container at the time of the EPA inspection.
 - e. State whether or not a "waste determination" and "LDR determination" were made for the content of each container.
 - f. If a "waste determination" was made for the content of each container, state whether the waste determination was based on analytic results or on the generator's knowledge of the process that generated the waste. If the determination was based on analytical results, provide any and all documentation of such results. If the determination was based upon the generator's knowledge,

provide a narrative explanation of the scientific basis for each such determination, and provide any supporting documentation.

- g. Was the content in each container determined to be “hazardous waste?” If so, state the specific EPA Hazardous Waste Code(s) associated with the content of each container that was determined to be hazardous waste.
 - h. If the content of each container was shipped off-site, submit copies of all bills of lading, manifests (hazardous and non-hazardous), shipping invoices, and LDR notices/certifications that accompanied each off-site shipment of the waste.
 - i. If the content of each container still remains on-site, state where such contents are currently located within the Facility and how such contents are currently being managed.
- 2. During the April, 2015 EPA CEI, Facility personnel stated that spent solvent contaminated rags and wipes generated in the Building 110- Bonding Area, Building 111 – Shelter Area, Building 117, and Building 300 – MRO Department are discarded in the regular trash. Please provide the following information regarding the stream:
 - a. Provide a detailed description of the process or processes which utilize solvent rags and wipes at the Facility.
 - b. Provide a detailed narrative explaining how the Facility manages its spent solvent rags and wipes waste stream from the time it is generated until it is shipped off-site for disposal.
 - c. Submit the SDSs and/or MSDSs for each of the solvent products used with its rags and wipes by the Facility.
 - d. State whether a “waste determination” and “LDR determination” have been made for each spent solvent rag and wipe generated throughout the Facility.
 - e. If a “waste determination” and “LDR determination” have been made for the Facility’s spent solvent rags and wipes, state when such determinations were made.
 - f. Were any of the Facility’s spent solvent rags and wipes determined to be hazardous waste? If so, state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste.
 - g. If a “waste determination” was made, state whether the determination was based on analytic results or on the generator’s knowledge of the process that generated the waste. If the determination was based on analytical results, provide any and all documentation of such results. If the determination was based upon the generator’s knowledge, provide a narrative explanation of the scientific basis for

such determination, and provide any supporting documentation.

- h. If the Facility's spent solvent rags and wipes waste stream has been disposed of in the regular trash, provide the name, address, and phone number of the municipal landfill that has been receiving the Facility's spent solvent rags and wipes waste stream.
 - i. If the Facility's spent solvent rags and wipes waste stream has been shipped off-site to a RCRA permitted treatment, storage and/or disposal ("TSD") facility, provide copies of all bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied the off-site shipment of the spent solvent rags and wipes from January 1, 2012 to the present.
 - j. State, as precisely as possible, the amount (in pounds) of spent solvent rags and wipes has been generated by the Facility each calendar month for the time period of January 1, 2012 up to the present and provide the basis of your knowledge. If you cannot state the amounts on a monthly basis, please state how much spent solvent wipes and rags waste has been generated during the smallest intervals for which you are capable of providing such information.
3. During the April, 2015 EPA CEI, the EPA inspector observed four containers used to collect spent acetone wipes located in the Building 110 Bonding Area. Please refer to Photo #19 of the attached EPA CEI Report, which depicts one of the four containers. At the time of the inspection, Facility personnel indicated that when full, the contents of the four containers is transferred into a black 55-gallon container located outside the Composite Lab, as seen in Photo #14, #16 & #17 in the attached EPA CEI Report. Please provide the following information regarding each of the four containers used to accumulate spent acetone wipes in the Building 110 Bonding Area:
- a. Provide a detailed description of the process or processes that generated the content of each container, and please provide a detailed description of the content of each container.
 - b. Provide a detailed narrative explaining how the Facility manages the content of each container from the time it is generated until it is shipped off-site for disposal.
 - c. State whether a "waste determination" and "LDR determination" have been made for the content of each container.
 - d. If a "waste determination" was made for the content of each container, state whether the waste determination was based on analytic results or on the generator's knowledge of the process that generated the waste. If the determination was based on analytical results, provide any and all documentation of such results. If the determination was based upon the generator's knowledge, provide a narrative explanation of the scientific basis for each such determination,

and provide any supporting documentation.

- e. Was the content in each container determined to be “hazardous waste?” If so, state the specific EPA Hazardous Waste Code(s) associated with the content of each container that was determined to be hazardous waste.
 - f. Indicate how long (i.e., days, weeks, months) it takes to fill each container. If an exact amount of time cannot be determined, estimate on average, how long it takes to fill the container and explain the basis for such estimate.
 - g. If the content of each container is transferred to any other container(s) at the Facility, describe, in detail, the location of any such container(s), and indicate how often (i.e. daily, weekly, monthly) transfers are made. If an exact amount of time cannot be determined, please estimate on average, how often the contents of each container is transferred to another container at the Facility.
4. During the April, 2015 EPA CEI, Facility personnel stated that spent two part epoxy that is generated in the Building 110 – Composite Area and the Building 110 – Bonding Area is discarded in the regular trash. Please provide the following information regarding the spent epoxy waste stream:
- a. Provide a detailed description of the process or processes which utilize each type of epoxy waste.
 - b. Provide a detailed narrative explaining how the Facility manages each epoxy waste stream from the time it is generated until it is shipped off-site for disposal.
 - c. Submit the SDSs and/or MSDSs for each of the two part epoxy products used by the Facility.
 - d. State whether a “waste determination” and “LDR determination” have been made for each spent epoxy waste stream generated throughout the Facility.
 - e. If a “waste determination” and “LDR determination” have been made for the Facility’s epoxy waste stream, state when such determinations were made.
 - f. Were any of the Facility’s spent epoxy waste streams determined to be hazardous waste? If so, state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste.
 - g. If a “waste determination” was made, state whether the determination was based on analytic results or on the generator’s knowledge of the process that generated the waste. If the determination was based on analytical results, provide any and all documentation of such results. If the determination was based upon the generator’s knowledge, provide a narrative explanation of the scientific basis for such determination, and provide any supporting documentation.

- h. If the Facility's spent epoxy waste stream has been disposed of in the regular trash, please provide the name, address, and phone number of the municipal landfill that has been receiving the Facility's spent epoxy waste stream.
 - i. If the Facility's epoxy waste stream has been shipped off-site to a RCRA permitted treatment, storage and/or disposal ("TSD") facility, provide copies of all bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied the off-site shipment of the spent epoxy waste from January 1, 2012 to the present.
 - j. State, as precisely as possible, the amount (in pounds) of the epoxy waste stream that has been generated by the Facility each calendar month for the time period of January 1, 2012 up to the present and provide the basis of your knowledge. If you cannot state the amounts on a monthly basis, state how much spent epoxy waste has been generated during the smallest intervals for which you are capable of providing such information.
5. During the April, 2015 EPA CEI, the Facility had a thinner recycler unit located in the Building 110 - Main Paint Booth. Facility personnel indicated that reclaimed solvent would be collected for reuse, and a solid material would be collected inside the unit in a bag. Facility personnel also indicated that it had not been used since 8/4/14. Please refer to Photo #25 & Photo #26 of the attached EPA CEI Report. Provide the following information regarding material accumulated in the plastic bag, as seen in Photo #26:
- a. Provide a detailed description of the content of the plastic bag.
 - b. State the exact date when the solvent recovery unit was last used prior to the EPA inspection. If an exact date cannot be determined, please estimate the generation month and year.
 - c. Provide the exact date on which the content of plastic bag was generated and state the basis of your knowledge. If an exact date cannot be determined, please estimate the generation month and year.
 - d. State the amount (weight and volume) of material in plastic bag at the time of the EPA inspection.
 - e. State whether or not a "waste determination" and "LDR determination" were made for the content of the plastic bag.
 - f. If a "waste determination" was made for the content of the plastic bag, state whether the waste determination was based on analytic results or on the generator's knowledge of the process that generated the waste. If the determination was based on analytical results, provide any and all documentation of such results. If the determination was based upon the generator's knowledge,

provide a narrative explanation of the scientific basis for each such determination, and provide any supporting documentation.

- g. Was the content of the plastic bag determined to be “hazardous waste?” If so, please state the specific EPA Hazardous Waste Code(s) associated with the content of the plastic bag.
 - h. If the content of the plastic bag was shipped off-site, submit copies of all bills of lading, manifests (hazardous and non-hazardous), shipping invoices, and LDR notices/certifications that accompanied each off-site shipment of the waste.
 - i. If the content of the plastic bag remains on-site, please state where such contents are currently located within the Facility and how such contents are currently being managed.
6. During the April, 2015 EPA CEI, the EPA inspector observed two 5-gallon containers of dirty solvent located in the Building 110 - Main Paint Booth area. Please refer to Photo #27 of the attached EPA CEI Report. Facility personnel indicated that these containers were sitting around for two months waiting to be recycled. Please provide the following information regarding the contents of the two containers, as seen in Photo #27:
- a. Provide a detailed description of the process or processes that generated the content of each container, and provide a detailed description of the content of each container.
 - b. Provide a detailed narrative explaining how the Facility manages the content of each container from the time it is generated until it is shipped off-site for disposal and/or recycled.
 - c. State whether a “waste determination” and “LDR determination” have been made for the content of each container.
 - d. If a “waste determination” was made for the content of each container, state whether the waste determination was based on analytic results or on the generator’s knowledge of the process that generated the waste. If the determination was based on analytical results, provide any and all documentation of such results. If the determination was based upon the generator’s knowledge, provide a narrative explanation of the scientific basis for each such determination, and provide any supporting documentation.
 - e. Was the content in each container determined to be “hazardous waste?” If so, state the specific EPA Hazardous Waste Code(s) associated with the content of each container that was determined to be hazardous waste.
 - f. State the exact location(s) at the Facility where the contents of each container was originally generated.

- g. State the amount (weight and volume) of material in each of the containers at the time of the EPA inspection.
7. During the April, 2015 EPA CEI, the EPA inspector observed a plastic tote used to accumulate bilge waste. The bilge waste is transferred into the tote from the pump out of Common Unmanned Surface Vehicles (CUSV). Please refer to Photo #32 of the attached EPA CEI Report. At the time of the inspection, Facility personnel indicated that the tote would be staged in this location with the above mentioned label until it is full, at which time EH&S personnel would come pick up the waste and put a hazardous waste label on the container. Please provide the following information regarding the content of the tote:
- a. Provide a detailed description of the process or processes that generated the content of the tote, and provide a detailed description of the content of the tote.
 - b. State how often (i.e. daily, weekly, monthly) transfers of material are made into the tote. If an exact amount of time cannot be determined, estimate on average, how often material is transferred into the tote.
 - c. State the amount (weight and volume) of material is transferred into the tote per transfer, and indicated the number of transfers it takes to fill the tote?
 - d. Indicate how long it takes to fill the tote? If an exact amount of time cannot be determined, estimate on average, how long it takes to fill the tote.
 - e. State the amount (weight and volume) of material in the tote at the time of the EPA inspection.
 - f. State whether or not a "waste determination" and "LDR determination" were made for the content of the tote.
 - g. If a "waste determination" was made for the content of the tote, state whether the waste determination was based on analytic results or on the generator's knowledge of the process that generated the waste. If the determination was based on analytical results, provide any and all documentation of such results. If the determination was based upon the generator's knowledge, provide a narrative explanation of the scientific basis for each such determination, and provide any supporting documentation.
 - h. Was the content of the tote determined to be "hazardous waste?" If so, state the specific EPA Hazardous Waste Code(s) associated with the content of the tote that was determined to be hazardous waste.
 - i. If the content of the tote was shipped off-site, submit copies of all bills of lading, manifests (hazardous and non-hazardous), shipping invoices, and LDR notices/certifications that accompanied each off-site shipment of the waste.

- j. If the content of the tote still remains on-site, state where such contents are currently located within the Facility and how such contents are currently being managed.
 - k. At the time of EPA's April, 2015 CEI it was the Facility's practice not to date or label the tote of bilge waste until it was full. Has the Facility ever had a different practice with regard to dating and labeling the totes of bilge waste? If so, describe such procedures and state the dates during which such procedures were in effect. In addition, provide the basis of your knowledge.
8. During the April, 2015 EPA CEI, the EPA inspector observed a black 55-gallon drum located just outside of the Paint Booth in Building 111. The drum was labeled with the words "Hazardous Waste" and dated as 3/10/15. Please refer to Photo #36 & #37 of the attached EPA CEI Report. At the time of the inspection, Facility personnel indicated that this drum was generated from the paint booth and has been accumulated at this location for a month. Please provide the following information regarding the black 55-gallon drum:
- a. Provide a detailed description of the process or processes that generated the content of the drum, and provide a detailed description of the content of the drum.
 - b. State the date on which the content of the drum was first generated and state the basis of your knowledge. If an exact date cannot be determined, estimate the generation month and year.
 - c. State the amount (weight and volume) of material in the drum at the time of the EPA inspection.
 - d. State the date when the drum became full. If an exact date cannot be determined, estimate the generation month and year.
 - e. State how long it took to fill the drum. If the exact amount of time cannot be determined, estimate how long it took.
 - f. State whether or not a "waste determination" and "LDR determination" were made for the content of the drum.
 - g. If a "waste determination" was made for the content of the drum, state whether the waste determination was based on analytic results or on the generator's knowledge of the process that generated the waste. If the determination was based on analytical results, provide any and all documentation of such results. If the determination was based upon the generator's knowledge, provide a narrative explanation of the scientific basis for each such determination, and provide any supporting documentation.

- h. Was the content of the drum determined to be “hazardous waste?” If so, state the specific EPA Hazardous Waste Code(s) associated with the content of the drum that was determined to be hazardous waste.
 - i. If the content of the drum was shipped off-site, submit copies of all bills of lading, manifests (hazardous and non-hazardous), shipping invoices, and LDR notices/certifications that accompanied the off-site shipment of the waste.
 - j. If the content of the drum still remains on-site, state where such contents are currently located within the Facility and how such contents are currently being managed.
 - k. Indicate by stating “Yes” or “No” to the following question: Does the Facility inspect the drum for leaks and deterioration?
 - l. If you answered “yes” to Question 8.k., above, indicate how often the inspections are completed, and 2) provide any and all inspection logs for the drum from January 1, 2012 to the present.
9. During the April, 2015 EPA CEI, the EPA inspector observed containers of solder dross waste. Please provide the following information regarding the Facility’s solder waste stream:
- a. Provide a detailed description of the process or processes that generate waste solder at the Facility.
 - b. Provide a detailed narrative explaining how the Facility manages its waste solder from the time it is generated until it is shipped off-site for disposal and/or recycling.
 - c. State whether a “waste determination” and “LDR determination” have been made for the waste solder generated throughout the Facility.
 - d. Was the waste solder determined to be hazardous waste? If so, state the specific EPA Hazardous Waste Code(s) associated with such hazardous waste.
 - e. If a “waste determination” was made, state whether the determination was based on analytic results or on the generator’s knowledge of the process that generated the waste. If the determination was based on analytical results, provide any and all documentation of such results. If the determination was based upon the generator’s knowledge, provide a narrative explanation of the scientific basis for such determination, and provide any supporting documentation.
 - f. If the Facility’s solder waste stream has been sent offsite for recycling, please provide the name, address, and phone number of any entities that has been receiving the Facility’s waste solder, and provide bills of lading, invoices, and

shipping records for each offsite shipment from January 1, 2012 to the present.

- g. If the Facility's waste solder has been shipped off-site to a RCRA permitted treatment, storage and/or disposal ("TSD") facility, provide copies of all bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied the off-site shipment from January 1, 2012 to the present.

- 10. During the April, 2015 EPA CEI, the EPA inspector observed a flammable locker located outside of Building 110. Inside the locker was a black 55-gallon drum with the words hazardous waste gasoline. Please refer to Photo #42 of the attached EPA CEI Report. It was stated the waste gasoline being stored in this container was generated from Building 118 during engine testing, and Facility personnel stated this drum has been at this location for approximately 6 months storing waste gasoline. Please provide the following information regarding the container of waste gasoline:
 - a. Provide a detailed description of the process or processes that generated the content of the container, and provide a detailed description of the content of the container.
 - b. Provide the date on which the content of the container was generated and state the basis of your knowledge. If an exact date cannot be determined, estimate the generation month and year.
 - c. State the amount (weight and volume) of material in the container at the time of the EPA inspection.
 - d. If the content of the container was shipped off-site, submit copies of all bills of lading, manifests (hazardous and non-hazardous), shipping invoices, and LDR notices/certifications that accompanied each off-site shipment of the waste.
 - e. If the content of the container still remains on-site, state where such contents are currently located within the Facility and how such contents are currently being managed.
- 11. During the April, 2015 EPA CEI, Facility personnel stated that the cured resin waste generated from composite work in Building 117 is discarded in the regular trash. Provide the following information regarding the spent resin waste stream:
 - a. Provide a detailed description of the process or processes which utilize each type of resin waste.
 - b. Provide a detailed narrative explaining how the Facility manages each resin waste stream from the time it is generated until it is shipped off-site for disposal.
 - c. Submit the SDSs and/or MSDSs for the resin products used by the Facility.

- d. State whether a “waste determination” and “LDR determination” have been made for each spent resin waste stream generated throughout the Facility.
 - e. If a “waste determination” and “LDR determination” have been made for the Facility’s resin waste stream, state when such determinations were made.
 - f. Were any of the Facility’s spent resin waste streams determined to be hazardous waste? If so, state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste.
 - g. If a “waste determination” was made, state whether the determination was based on analytic results or on the generator’s knowledge of the process that generated the waste. If the determination was based on analytical results, provide any and all documentation of such results. If the determination was based upon the generator’s knowledge, provide a narrative explanation of the scientific basis for such determination, and provide any supporting documentation.
 - h. If the Facility’s spent resin waste stream has been disposed of in the regular trash, provide the name, address, and phone number of the municipal landfill that has been receiving the Facility’s spent resin waste stream.
 - i. If the Facility’s resin waste stream has been shipped off-site to a RCRA permitted treatment, storage and/or disposal (“TSD”) facility, provide copies of all bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied the off-site shipment from January 1, 2012 to the present.
 - j. State, as precisely as possible, the amount (in pounds) of the resin waste stream that has been generated by the Facility each calendar month for the time period of January 1, 2012 up to the present and provide the basis of your knowledge. If you cannot state the amounts on a monthly basis, state how much resin waste has been generated during the smallest intervals for which you are capable of providing such information.
12. During the April, 2015 EPA CEI, within the thin film wet lab located in Building 112, Facility personnel indicated that waste paste is generated from bonding testing processes. The waste paste is managed as hazardous waste, and is then cured through heating prior to disposal. Please provide the following information regarding the heated waste paste that is heated in Building 112:
- a. Provide a detailed description of the process or processes that generate waste paste at the Facility.
 - b. Provide a detailed narrative explaining how the Facility manages its waste paste from the time it is generated until it is shipped off-site for disposal.

- c. Does the Facility keep track of the amount (weight & volume) of heated waste paste generated by the Facility over time? If so, (1) explain how the Facility measures the amount of waste paste generated and (2) state how often such measurements are taken, for example daily, weekly, monthly, or for some other predetermined period of time?
- d. State, as precisely as possible, how much (weight & volume) waste paste has been generated by the Facility from heating in each calendar month for the time period of January 1, 2012 up to the present and provide the basis of your knowledge. If you cannot state the amounts on a monthly basis, state how much waste paste has been generated during the smallest intervals for which you are capable of providing such information.
- e. Does the Facility maintain written records that document how much waste paste is generated from heating and evaporation? If so, submit any and all such records for the time period of January 1, 2012 up to the present.
- f. Describe in detail and provide any Standard Operating Procedures (SOPs) that were in effect from January 1, 2012 to the present which documents how the waste paste generated from heating and evaporation will be managed from the time it is generated until the time it is shipped off-site.
- g. Submit the SDSs and/or MSDSs for the paste and other products that are heated by the Facility prior to disposal.
- h. State whether or not a "waste determination" and "LDR determination" were made for the waste paste.
- i. If a "waste determination" was made for the waste paste, state whether the waste determination was based on analytic results or on the generator's knowledge of the process that generated the waste. If the determination was based on analytical results, provide any and all documentation of such results. If the determination was based upon the generator's knowledge, provide a narrative explanation of the scientific basis for each such determination, and provide any supporting documentation.
- j. Was the heated waste paste determined to be "hazardous waste?" If so, state the specific EPA Hazardous Waste Code(s) associated with the waste paste that was determined to be hazardous waste.
- k. Has the heated waste paste ever been shipped off-site for disposal? If so, submit copies of all bills of lading, manifests (hazardous and non-hazardous), shipping invoices, and LDR notices/certifications that accompanied the off-site shipment of this waste.

- l. Facility personnel indicated that the waste paste generated from bonding testing is heated, and the heating process drives off Volatile Organic Compounds (VOCs). Please provide: 1) a detailed description and identify the source of VOCs from the waste paste waste stream, 2) state the amount (weight and volume) of VOCs that is evaporated from the heating process, 3) state how long the heating process typically takes, and 4) state how often (i.e. daily, weekly, monthly) that Facility heats the waste paste.
13. Please submit copies of all hazardous waste manifests retained by the Facility for all off-site shipments of hazardous waste that occurred during the time period of January 1, 2012 up to the present.
14. During the April, 2015 EPA CEI, the EPA inspector requested to review a copy of a Biennial Hazardous Waste Report from the Facility. At the time of the inspection, the document was not available for review. Indicate by stating "yes" or "no": (1) Did the Facility submit a Biennial Hazardous Waste Report for the 2013 and 2015 calendar year?
 - a. If you answered "yes", provide a copy of such submission as an attachment to your response.
 - b. If you answered "no", explain, in detail, why the Facility did not timely submit a Biennial Hazardous Waste Report for the 2013 and 2015 calendar year.
15. During the April, 2015 EPA CEI, the EPA inspector requested to review a copy of a Contingency Plan from the Facility. At the time of the inspection, the Facility did not have a Contingency Plan for the EPA inspector to review. Please indicate by stating "yes" or "no": Did the Facility have a documented contingency plan in effect at the time of the April, 2015 EPA inspection?
 - a. If you answered "yes", submit a copy of the contingency plan that was in effect at the time of the April, 2015 EPA inspection, and state the date that it was completed and in effect.
 - b. If you answered "no", submit a copy of the contingency plan currently in effect at the Facility, and indicate the date it was completed and in effect.

A copy of the April, 2015 CEI report documenting the findings of the inspector is enclosed as Attachment A for your information, and includes only those attachments not provided by the facility representative(s) at the time of or subsequent to the inspection.

The provisions of Section 3008 of RCRA, 42 U.S.C. § 6928, authorize EPA to pursue penalties for failure to comply with or respond adequately to an information request under Section 3007(a) of RCRA. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001. The information you provide may be used by EPA in administrative, civil or criminal proceedings.

With regard to the Small Business Regulatory Enforcement and Fairness Act ("SBREFA"), please see the "Information for Small Businesses" memo, enclosed as Attachment B, which might be applicable to your facility. This enclosure provides information on contacting the SBREFA Ombudsman to comment on federal enforcement and compliance activities and also provides information on compliance assistance. As noted in the enclosure, any decision to participate in such program or to seek compliance assistance does not relieve your Facility of its obligation to respond in a timely manner to an EPA request or other enforcement action, create any rights or defenses under law, and will not affect EPA's decision to pursue an enforcement action. To preserve your Facility's legal rights, you must comply with all rules governing the administrative enforcement process. The Ombudsman and fairness boards do not participate in the resolution of EPA's enforcement actions. EPA has not made a determination as to whether or not your Facility is covered by SBREFA.

Your Facility is entitled to assert a claim of business confidentiality covering any part or all of the information submitted, in a manner described in 40 C.F.R. § 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with 40 C.F.R. Part 2, Subpart B. Unless a claim of business confidentiality is asserted at the time the requested information is submitted, EPA may make this information available to the public without further notice to your Facility.

This request for information is not subject to review by the Office of Management and Budget pursuant to the Paperwork Reduction Act, 44 U.S.C. §§ 3501-3520.

Your response must include the following signed and dated certification:

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature: _____
Name: _____
Title: _____

Please send your response to:

Andrew Ma
US EPA Region III
Environmental Science Center
701 Mapes Road
Fort Meade, MD 20755-5350

If you have any questions concerning this matter, please contact Mr. Andrew Ma at (410) 305-3429.

Sincerely,

A handwritten signature in black ink, appearing to read "Carol Amend". The signature is fluid and cursive, with the first name "Carol" being more prominent than the last name "Amend".

Carol Amend, Associate Director
Land and Chemicals Division
Office of Land Enforcement

Enclosures

cc: A. Ma (3LC70) w/o

